

1 ROBERT B. HAWK, SBN 118054
HOGAN LOVELLS US LLP
2 4085 Campbell Avenue, Suite 100
Menlo Park, CA 94025
3 Tel: (650) 463-4000
Fax: (650) 463-4199
4 robert.hawk@hoganlovells.com

5 HELEN TRAC, SBN 285824
HOGAN LOVELLS US LLP
6 3 Embarcadero Center, Suite 1500
San Francisco, CA 94111
7 Tel: (415) 374-2300
Fax: (415) 374-2499
8 helen.trac@hoganlovells.com

9 JAMES TANSEY, SBN 293332
HOGAN LOVELLS US LLP
10 100 International Drive
Baltimore, MD 21202
11 Tel: (410) 659-2700
james.tansey@hoganlovells.com

12 *Attorneys for Defendant*
13 Mercedes-Benz USA, LLC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 STEVE FERRARI, MIKE KEYNEJAD, and
18 PATRICIA RUBIN, individually and as
representatives of the Class of Persons similarly
19 situated,

20 Plaintiffs,

21 v.

22 AUTOBAHN, INC. DBA AUTOBAHN
MOTORS; MERCEDES-BENZ USA, LLC;
23 SONIC AUTOMOTIVE, INC.; AND
SPEEDWAY MOTORSPORTS, INC,

24 Defendants.
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Case No. 4:17-cv-18

NOTICE OF RELATED CASES

1 TO THE COURT AND ALL PARTIES OF RECORD:

2 PLEASE TAKE NOTICE that on January 4, 2017, Mercedes-Benz USA,
3 LLC (“MBUSA”) filed a Notice of Removal, pursuant to 28 U.S.C. § 1453 *et seq.*
4 from the Superior Court of the State of California for the County of San Mateo.

5 1. MBUSA is informed and believes that *Ferrari, et al. v. Autobahn, Inc.,*
6 *et al.*, Case No. 4:15-CV-04379-YGR, is related to the instant Removal because:

7 a. Both cases involve overlapping plaintiffs: Steve Ferrari, Mike Keynejad,
8 Hooshang Jowza, Celso Frazao, Renuka Narayan, Gertrud Frankrone, Ernest
9 Salinas, Kalkhusan Sareen, Hossein Jalali, Ron Wolfe, Sohrab Rahimzadeh, Fred
10 Grant, Ester Grant, Jessica Langridge, Tony Nicolosi, Donald Lyang, Artur
11 Semichev, John Diaz, Harold Fethe and Ray Gapasin.

12 b. Both cases involve the same defendants: Autobahn, Inc., MBUSA, Sonic
13 Automotive, Inc. and Speedway Motorsports, Inc.

14 c. Both cases involve the same or similar claims based on the same or
15 similar alleged conduct: violation of California Business & Professions Code
16 Section 17500, Fraud-intentional misrepresentation, Fraud-concealment, Negligent
17 Misrepresentation, violation of California Business & Professions Code Section
18 17200 and Negligence, all relating to the alleged use of non-OEM parts in the
19 vehicles of Autobahn, Inc. and Sonic Automotive, Inc. customers.

20 2. MBUSA will file an Administrative Motion to Consider Whether the
21 Cases Should Be Related.

22 3. Other than *Ferrari, et al. v. Autobahn, Inc., et al.*, Case No. 4:15-CV-
23 04379-YGR, based on information and belief, MBUSA states that there are no
24 related cases previously filed or currently pending in the Northern District of
25 California.
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Dated: January 4, 2017

HOGAN LOVELLS US LLP

By: /s/ Robert B. Hawk
Robert B. Hawk
Attorneys for Defendant
MERCEDES-BENZ USA, LLC